

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JAMAAL CAMERON; RICHARD
BRIGGS; RAJ LEE; MICHAEL
CAMERON; MATTHEW
SAUNDERS, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

MICHAEL BOUCHARD, in his
official capacity as Sheriff of Oakland
County; CURTIS D. CHILDS, in his
official capacity as Commander of
Corrective Services; OAKLAND
COUNTY, MICHIGAN,

Defendants.

Case No. 20-cv-10949-LVP-MJH
Hon. Linda V. Parker

DECLARATION OF JACQUELINE WILLIAMS

I, Jacqueline Williams, declare:

I make this declaration based upon my own personal knowledge, and if called to testify, I could and would do so competently.

1. I am currently incarcerated at the Oakland County Jail (“the Jail”). I have been in Jail since February 6, 2020. I am scheduled to be released on November 8, 2020.
2. I suffer from pulmonary heart disease and prior to being incarcerated, I was under the care of a heart specialist. I was also involved in an automobile accident on January 25, 2020, and I suffered injuries to my back. Additionally, I have been having pins and needles sensations in my legs. I was able to see a nurse for this, but she could not help me resolve the problem and could not confirm when I would be able to see a doctor for further assessment.

3. I have a cellmate, and social distancing is impossible. If I am sitting at the desk in our cell, I can touch my cellmate while she is sitting on her bed. All of the trustees are out performing trustee duties at the same time, so there is no way to practice social distancing while we are performing our duties. The guards do not all wear masks.

4. I had a temperature of 99.6 in late March of 2020 and the nurse did not follow up when I complained of having a fever. I received a face mask for the first time on March 28, 2020.

5. The commissary has been closed for the past three weeks, so I am not able to purchase basic hygiene items that I need. The soap provided by the jail causes me to have severely dry skin.

6. I am only permitted to leave my cell for a half hour, twice a day. This is the only time that I have to clean my cell, shower, or make phone calls.

7. I am only allowed to clean my cell (including the toilet) every five days. We do not receive rags to clean, so we have to tear up the blankets we are given and use that to clean.

8. I have been given no additional information from the officers in relation to COVID 19.

9. The officers leave the doors between the pods open. I hear them saying things like, "We are all going to get it anyway."

Under 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

April 27, 2020

/s/ Jacqueline Williams

Jacqueline Williams

*consent for signing given telephonically

Due to the COVID-19 crisis, it was not possible to obtain a written signature on the above declaration. I am an attorney admitted to the Eastern District of Michigan. On April 27, 2020, I personally spoke with Jacqueline Williams and read this declaration to her. Jacqueline Williams told me that the information in the above declaration is true and gave me verbal consent to sign on her behalf.

I declare under penalty of perjury, under 28 U.S.C. § 1746, that the foregoing is true and correct.

/s/ Syeda Davidson
Syeda Davidson